

**UNITED STATE BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re: Veronica Deshay,	)	
	)	Chapter 13
(Debtor)	)	
	)	18-42077
Chapter 13 Trustee	)	
(Movant)	)	

**DEBTOR'S RESPONSE TO THE TRUSTEE'S MOTION TO DISMISS**

COMES NOW, Douglas M. Heagler, attorney for Debtor, and in response to the Trustee's Motion to Dismiss, states the following:

1. The Debtor admits the allegation in paragraph 1.
2. The Debtor admits the allegation in paragraph 2.
3. The Debtor admits the allegation in paragraph 3.
4. The Debtor admits the allegation in paragraph 4.
5. The Debtor admits the allegation in paragraph 5.
6. The Debtor admits the allegation in paragraph 6.
7. The Debtor admits the allegation in paragraph 7.
8. The Debtor admits the allegation in paragraph 8.
9. The Debtor admits the allegation in paragraph 9.
10. Debtor is working on providing these returns to the Trustee.

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WHEREFORE, for the above reasons, Debtor pray this Court will enter an order denying the Trustee's motion to dismiss.

Respectfully Submitted,

/s/ Douglas M. Heagler  
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Clayton, MO 63105  
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#### **CERTIFICATE OF SERVICE**

I certify that a copy of the attached pleading was mailed postage pre-paid or by electronic service on or before April 19, 2023 to the following parties:

Diana Daugherty  
P.O. Box 430908  
St. Louis, MO 63101

Office of the United States Trustee  
111 S. 10<sup>th</sup> Street, Ste. 6353  
St. Louis, MO 63143

/s/ Douglas M. Heagler  
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